

HONORABLE JOHN C. COUGHENOUR

**UNITED STATES DISTRICT COURT  
DISTRICT OF WASHINGTON  
AT SEATTLE**

SIXTY-01 ASSOCIATION OF APARTMENT  
OWNERS, a Washington non-profit  
corporation,

Plaintiff,

v.

PUBLIC SERVICE INSURANCE  
COMPANY; et al.,

Defendants.

Case No. 2:22-cv-01373-JCC

STIPULATED MOTION TO ALLOW TWO  
DEPOSITIONS AFTER THE DISCOVERY  
END DATE

NOTE ON MOTION CALENDAR:  
**January 16, 2025**

COMES NOW Defendant Public Service Insurance Company (“PSIC”) and Plaintiff  
Sixty-01 Association of Apartment Owners (“Plaintiff”), by and through their counsel of record  
and hereby moves this Court for an Order to allow the Parties to conduct two depositions after the  
January 17, 2025 discovery end date set by the Court.

The Parties have been diligently working to complete the remaining depositions before  
January 17, 2025. Due to various circumstances, including witness availability, the Parties have  
agreed to conduct two depositions the week of January 20, 2025. These depositions will consist  
of: (1) PSIC’s Tax Expert Robert Wood; and (2) Plaintiff’s Tax Expert John Colvin. The Parties

represent that neither party will be prejudiced by these two depositions after the January 17, 2025 discovery end date and there will be no impact on the other deadlines set by the Court.

DATED this 15th day of January, 2025.

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ASHBAUGH BEAL

s/ Terri A. Sutton

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4 *Attorney for Defendant Public Service*  
5 *Insurance Company*

6  
7  
8 **ORDER**

9 IT IS SO ORDERED.

10 DATED this 16th day of January 2025.

11 

12 JUDGE JOHN C. COUGHENOUR  
13 United States District Judge

14 //

15 //

16  
17 Presented by:

18 KENNEDYS CMK LLP

ASHBAUGH BEAL

19 s/ Terri A. Sutton

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Attorney for Defendant Public Service  
Insurance Company

Attorneys for Sixty-01 Association of  
Apartment Owners

### **CERTIFICATE OF SERVICE**

I, Terri A. Sutton, hereby declare and state as follows:

I am a citizen of the United States and employed in Seattle, Washington; I am over the age of eighteen years and not a party to the within action; my business address is 1420 Fifth Avenue, Suite 2200, Seattle, Washington, 98101.

On the date set forth below, I caused to be served:

• **STIPULATED MOTION TO ALLOW TWO DEPOSITIONS AFTER THE  
DISCOVERY END DATE**

in the within matter by arranging for a copy to be delivered on the interested parties in said action, in the manner described below, addressed as follows:

|  |   |
|--|---|
| Kristen B. Moran, WSBA # 59328<br>Jesse D. Miller, WSBA #35837<br>Zachary O. McIsaac, WSBA #35833<br>Ashbaugh Beal<br>920 Fifth Avenue<br>Suite 3400<br>Seattle, WA 98104<br><a href="mailto:kmoran@ashbaughbeal.com">kmoran@ashbaughbeal.com</a><br><a href="mailto:miller@ashbaughbeal.com">miller@ashbaughbeal.com</a><br><a href="mailto:zmcisaac@ashbaughbeal.com">zmcisaac@ashbaughbeal.com</a><br>Attorneys for Plaintiff | <input checked="" type="checkbox"/> by ECF Court efilng Application to the extent counsel is registered<br><input checked="" type="checkbox"/> by Electronic Mail:<br><input type="checkbox"/> by Facsimile Transmission<br><input type="checkbox"/> by First Class Mail<br><input type="checkbox"/> by Hand Delivery<br><input type="checkbox"/> by Overnight Delivery |
| Michael S. Wampold, WSBA #26052<br>Tomis A. Gahan, WSBA #32779<br>PWRFL<br>1001 4 <sup>th</sup> Avenue, Suite 4131<br>Seattle, WA 98154<br><a href="mailto:wampold@pwrfl-law.com">wampold@pwrfl-law.com</a><br><a href="mailto:gahan@pwrfl-law.com">gahan@pwrfl-law.com</a><br><a href="mailto:kelsey@pwrfl-law.com">kelsey@pwrfl-law.com</a><br>Attorneys for Plaintiff   | <input checked="" type="checkbox"/> by ECF Court efilng Application to the extent counsel is registered<br><input checked="" type="checkbox"/> by Electronic Mail:<br><input type="checkbox"/> by Facsimile Transmission<br><input type="checkbox"/> by First Class Mail<br><input type="checkbox"/> by Hand Delivery<br><input type="checkbox"/> by Overnight Delivery |

DATED this 15th day of January, 2025, at Seattle, WA.

/s/ Terri A. Sutton  
Terri A. Sutton